

**From:** toshea@cleanfish.com  
**Sent:** Wednesday, July 05, 2006 2:26 PM  
**To:** National List  
**Subject:** docket number TM-06-04

**Attachments:** ATTACHMENT.TXT

Bob Pooler,  
Agricultural Marketing Specialist

I write in opposition to allowing identified synthetic substances to be used in agricultural processes identified as "USDA Organic". I write to say NO to the use of Sucrose octanoate esters (CAS s--42922-74-7; 58064-47-4). Sucrose octanoate esters (SOE) as petitioned for use in organic crop production as an insecticide/miticide.

The term "organic" will have no informational, or marketing value if synthetic substances are used to simply make industrial scale operations of agriculture more utilitarian for use by farm operations that seek organic labels.

One of the clear tests for whether any current or future practice is truly acceptable as organic is whether or not it is safe for those working on the farms. If special warnings must come with the planned for use of this substance, how can it be called 'organic'?

Please do not allow this synthetic substance to be used under the rules of organic certification and labeling of food products.

Timothy o'Shea

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